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**From:** Scianni, Melissa [Scianni.Melissa@epa.gov]  
**Sent:** 5/3/2013 4:43:36 PM  
**To:** kelley.e.reid@usace.army.mil  
**CC:** Fondahl, Lauren [Fondahl.Lauren@epa.gov]; Prat, Dean@Waterboards [Dean.Prat@waterboards.ca.gov]; Prat, Rachel@Waterboards [Rachel.Prat@waterboards.ca.gov]; Brush, Jason [Brush.Jason@epa.gov]  
**Subject:** EPA comments Eureka Bio-solids (PN 1998-240140N)

Kelley:

Thank you for the opportunity to review Public Notice 1998-240140N for the Eureka Bio-solids Project. The City of Eureka proposes to spray bio-solids on a property they own that is adjacent to Humboldt Bay. The property is former tidal marsh that was leveed when the railroad was built. The 80-acre site has 74 acres of jurisdictional wetlands and is used to grow hay for cattle. Bio-solids would be applied in the summer and disked into the soil. This permit is being considered pursuant to Section 10 of the Rivers and Harbors Act.

We recommend the Corps and City look for alternate disposal options that do not involve application on properties that contain wetlands and are so close to the Bay. There are a number of upland properties in agriculture production in the area that could be more suitable sites. We understand that a number of waste water treatment plants in Humboldt County compost bio-solids onsite and then provide them for agriculture use. The City should also investigate whether this a viable alternative. Application in wetland areas should only be permitted if there are no other practicable upland disposal options.

Thank you for considering our recommendations.  
Melissa

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